UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SCANSOFT, INC., Plaintiff, v. VOICE SIGNAL TECHNOLOGIES, INC., LAURENCE S. GILLICK, ROBERT S. ROTH, JONATHAN P. YAMRON, and MANFRED G. GRABHERR, Defendants.	C. A. No. 04-10353-PBS

AFFIDAVIT OF LAURENCE S. GILLICK

I, Laurence S. Gillick, on oath depose and say:

1.   I am a defendant in this case. I serve as Voice Signal Technologies' Vice President of Core Technologies. I make this Affidavit in response to the portion of ScanSoft's Memorandum In Support Of Motion To Strike Proposed Neutral Experts that relates to contacts between Professor Phil Woodland and Voice Signal personnel.

2.   ScanSoft states that, at workshops held in the 1990s, Professor Woodland made presentations "with" me and others who were then employed at Dragon Systems, Inc. and are now employed at Voice Signal Technologies. The statement is misleading.

3.   The workshops to which ScanSoft refers were sponsored by the Defense Advanced Research Projects Agency ("DARPA"). During that period, several organizations competed for speech recognition research funding provided by the United States Government through DARPA. A team from Cambridge University was one competitor; Dragon was another;

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and there were several other competing groups. Typically, DARPA would identify a particular set of recordings to be transcribed. The competing groups would each apply their speech recognition systems to these speech samples. The results were scored for accuracy and other criteria. Representatives of the competing groups then made presentations at "workshops" sponsored by DARPA describing how their respective systems worked.

4.   Professor Woodland was part of a team from Cambridge University that made workshop presentations. The Dragon personnel, including myself, Robert Roth, and on one or more occasions, Jon Yamron, made competing presentations. There was no collaboration between Dr. Woodland or others at Cambridge University and the Dragon group. These "workshops" were meetings attended by approximately 100 participants. Among others who attended were Francis Ganong and Vlad Sejnoha, who are today employed at ScanSoft.

5.   From time to time I have spoken to Professor Woodland at professional conferences. I have had similar contacts at these conferences with dozens of people who are active in the speech recognition field. I have never spoken to Professor Woodland about this case. To the best of my knowledge, no one else at Voice Signal has spoken to Professor Woodland about this case.

6.   Gunnar Evermann has been employed by Voice Signal as a Research Scientist since October, 2004. He has no management responsibilities. He is one of fifteen research scientists at the company.

Signed under the pains and penalties of perjury this 15th day of August, 2005.

Laurence S. Gillick
Laurence S. Gillick

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